

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

In re:	:	
	:	Case No.: 1:19-bk-03559-HWV
Shanna M. Ackerley	:	Chapter 13
Debtor(s)	:	Judge Henry W. Van Eck
	:	*****
Wells Fargo Bank, N.A., d/b/a Wells	:	
Fargo Auto	:	
Movant	:	
	:	
v.	:	
	:	
Shanna M. Ackerley	:	
Charles J. DeHart III, Trustee	:	
Respondents	:	

**OBJECTION OF WELLS FARGO BANK, N.A., D/B/A WELLS FARGO AUTO TO
CONFIRMATION OF THE PLAN (DOCKET NUMBER 5)**

Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto ("Creditor") by and through its undersigned counsel, objects to the confirmation of the currently proposed Chapter 13 Plan ("Plan") filed by Shanna M. Ackerley ("Debtor") as follows:

1. Creditor holds a security interest secured by a lien on Debtor's personal property commonly known as a 2009 Honda Odyssey with the Vehicle Identification Number 5FNRL38749B019067 ("Property").
2. Creditor has filed Proof of Claim number 6 in the amount of \$10,154.85. This amount includes a pre-petition arrearage in the amount of \$1,250.54.
3. Debtor's Plan seeks to improperly cramdown Creditor's lien to a secured value of \$4,417.00 at an interest rate of 6.25%.
4. As of the bankruptcy petition filing date, Creditor believes the Property had a value of \$8,550.00.

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5. Pursuant to 11 U.S.C. §506, Creditor is entitled to a secured claim based on the replacement value of the property on the date the bankruptcy was filed. Creditor requests an opportunity to conduct a full appraisal of the Property.

WHEREFORE, Creditor respectfully requests that the Court deny the confirmation of the Debtor's currently proposed Plan.

Respectfully submitted,

/s/ Karina Velter

Karina Velter, Esquire (94781)
Adam B. Hall (323867)
Sarah E. Barngrover (323972)
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028
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Attorneys for Creditor
The case attorney for this file is Karina Velter.
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v.	:	
	:	
Shanna M. Ackerley	:	
Charles J. DeHart III, Trustee	:	
Respondents	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Objection of Wells Fargo Bank, N.A., d/b/a Wells Fargo Auto to the Confirmation of the Original Plan was served on the parties listed below via e-mail notification:

United States Trustee, 228 Walnut Street, Suite 1190, Harrisburg, PA 17101

Charles J. DeHart III, Chapter 13 Trustee, 8125 Adams Drive, Suite A, Hummelstown, PA 17036

Tracy Lynn Updike, Attorney for Shanna M Ackerley, Serratelli Schiffman & Brown, PC, 2080 Linglestown Road, Ste 201, Harrisburg, PA 17110, tupdike@ssbc-law.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on October 28, 2019:

Shanna M Ackerley, 306 Cherry Street, Wrightsville, PA 17368

DATE: 10/28/19

/s/ Karina Velter

Karina Velter, Esquire (94781)
Adam B. Hall (323867)
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